

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHUN-KO CHANG, individually and on behalf of all others similarly situated,

Plaintiff,

-against-

SHEN YUN PERFORMING ARTS, INC., FEI TIAN COLLEGE, FEI TIAN ACADEMY OF THE ARTS, DRAGON SPRINGS BUDDHIST INC., INTERNATIONAL BANK OF CHICAGO, SHUJIA GONG a/k/a TIANLIANG ZHANG, HONGZHI LI, and RUI LI,

Defendants.

Pursuant to Local Civil Rule 1.4, the motion to withdraw as counsel for Defendant SHUJIA GONG (“Defendant”), in the above-captioned matter, and from the docket and the ECF distribution list.

**Civil Action No.: 7:24-CV-8980 (PMH)**

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

Application granted. The Clerk of Court is directed to terminate Justin R. Marino as an attorney in this matter.

The Clerk of the Court is respectfully directed to terminate the letter motion pending at Doc. 42.

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
February 6, 2025

## I PROCEDURAL HISTORY

On or about November 25, 2024, Plaintiff filed her Complaint. Plaintiff purports to have effectuated service upon the Defendant on or about December 20, 2024, which would have required a responsive pleading on or before January 10, 2025. *See Affidavit of Service (Dkt. 16).*

On or about January 2, 2025, the undersigned filed a notice of appearance on behalf of Defendant and sought an extension of time to answer, move or otherwise respond to the Complaint. See Motion (Dkt. 25). The Court granted the motion on January 6, 2025, requiring a responsive pleading to be filed on or before February 19, 2025. See Order (Dkt. 26, Jan. 6, 2025).

At all times, the movant faithfully represented the Defendant and worked diligently and efficiently, advocating, respecting and preserving all rights and defenses, and ensuring all deadlines were maintained.

## **II. REASON FOR WITHDRAWAL**

The reason for this request is that the Defendant has retained new counsel (i.e., Steven Schneebaum, Justin Butterfield, Lea Patterson, and Terri Marsh), who have appeared on behalf of Defendant.

The movant anticipates that incoming counsel will need and promptly seek an extension of the current date for responding to the Complaint.

Defendant consents to and has requested the undersigned make this motion.

Date: February 5, 2025  
Deer Park, New York

/s/ Justin R. Marino

Justin R. Marino, Esq.  
STEVENSON MARINO LLP  
2000 Deer Park Avenue  
Deer Park, NY 11729  
212.939.7228 (o)

Attorneys for Defendant  
SHUJIA GONG a/k/a TIANLIANG ZHANG